## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

MALIBU MEDIA, LLC,	)
Plaintiff,	) Civil Action Case No. 1:18-cv-01618 ) Honorable John Z. Lee
V.	)
GERMOND CHE PATTON,	) ) )
Defendant.	) ) )

## PLAINTIFF'S MOTION FOR ENTRY OF JUDGMENT AGAINST GERMOND CHE PATTON

Plaintiff, Malibu Media, LLC ("Plaintiff"), by and through undersigned counsel, and pursuant to Fed.R.Civ.P. 56, and this Honorable Court's Minute Entry of October 31, 2019 [CM/ECF 53], hereby files its Motion for Entry of Judgment ("Motion") against Defendant, Germond Che Patton ("Defendant"), and in support thereof, states:

personal jurisdiction over defendant because (i) Defendant committed the tortious conduct in this State, (ii) Defendant resides in this State, and/or (iii) Defendant has engaged in substantial and not

1. On October 31, 2019 this Court entered an order granting Plaintiff's motion for summary judgment.

isolated business activity in this State.

2. This Motion is further based on the Memorandum of Points and Authorities in Support of Motion for Entry of Judgment filed contemporaneously herewith, and the record of the proceedings and papers on file herein. These materials are sufficient to justify the requested relief.

WHEREFORE, Plaintiff, Malibu Media, LLC, respectfully requests entry of a judgment in favor of Plaintiff and against Defendant, Germond Che Patton, in the form of the Proposed

Judgment and Permanent Injunction attached hereto, and for such other and further relief this Court deems just and proper.

Dated: November 18, 2019 Respectfully submitted,

By: /s/ Mary K. Schulz Mary K. Schulz, Esq.

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Attorneys for Plaintiff

## **CERTIFICATE OF SERVICE**

I hereby certify that on November 18, 2019, I electronically filed the foregoing document with the Clerk of the Court and all parties using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

By: /s/ Mary K. Schulz